REMARKS

Claim 1 has been amended to include the limitations of each of claims 2-7. Because the amendments merely combine claims, it is respectfully submitted that they do not raise new issues, and entry of the amendment is respectfully requested.

The rejection of claims 1-10 under 35 USC §103(a) in view of U.S. Patent Publication No. 2004/0123302 (Lo) and newly-cited U.S. Patent No. 6,526,442 (Stupek) is respectfully traversed on the grounds that the Lo publication and the Stupek patent fail to disclose or suggest, whether considered individually or in any reasonable combination, a Web-based manager implemented in a domain consisting of a workstation and a network device, in which an HTTP process module requests each network device to read data about its respective Web agent by polling and having the network device send back a required packet as recited in original claim 7, and now recited in claim 1.

In the invention as now claimed, the **network devices** are given the responsibility of **polling** respective Web agents on each network device, and **reporting back** via a packet to an HTTP process module *"operative to connect to the nodes in each network device"* (recited in original claim 3 and now recited in claim 1). This relieves the central module or Web manager of having to memorize and account for device IPs of all communication devices on the network, thereby more effectively exploiting the "intelligence" of the network devices.

According to the Examiner: *"Both Lo and Stupek further disclose wherein every predetermined period of time the HTTP process module acts to request each network device to read data about the Web agent thereof by polling and send back a packet required by the Web agent, (Lo – paragraphs #0067-0074), (Stupek – Fig. 14A; Col. 5, lines 40-67; Col. 6, lines 1-32; & Col. 16, lines 10-63)."* However, the Applicant has reviewed the cited passages in Lo and Stupek, and none of the cited passages discloses **periodic polling, *by network devices*, of Web agents *on the network devices*,** as claimed, the polling being **at the request of an HTTP**

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process module that connects to the nodes in each of the network devices, and the results of the polling being sent in the form of a **packet** *from the network device* **to the HTTP process module.**

Instead, the cited passages in the Lo publication concern HTTP communications between the Web browser (agent) and Web server (HTTP module) in the form of an object request sent from the agent to the server (which forwards the request to a gateway), processing of the object, and return of an appropriate page. There is <u>no suggestion</u> of the claimed periodic polling of the Web agent *by the network device* with which the network device is associated, much less sending results of the poll back to the HTTP module of the server. As pointed out in the previous response, whereas the claimed invention simplifies network management by replacing the conventional database of IP addresses of managed devices with an HTML file containing hyperlinks, Lo essentially seeks to permit ERP devices to communicate over the web using an appropriate ERP to web-protocol interface.

The Stupek patent does not make up for this deficiency. The cited passages in the Stupek patent not only have <u>nothing to do with</u> replacing the conventional database of IP addresses of managed devices with HTML files containing hyperlinks, much less by using intelligent network devices to simplify Web management by having the network devices update the HTML files via a periodic polling procedure. To the contrary, Fig. 14A of Stupek discloses a display screen of a client system 106 that gives the client system 106 control of "legacy devices" 112 *via a management server 102*, and the associated description concerns management services performed by the management server 102. Data is collected from the legacy devices by "*the particular protocol supported (SNMP, DMI),*" as explained in col. 6, lines 23-32, before being stored in a database 128. HTTP is used for communications between the management server 10 and client system 106, neither of which corresponds to the network devices 112 being managed.

Basically, the approach taken by Stupek is to give the management server <u>more</u> rather than less responsibility for control of managed elements, which is exactly <u>opposite</u> the approach

taken by the present invention. There is <u>no suggestion</u> in Stupek of simply having an HTTP process module, as opposed a management server accessed through a client system, periodically request that a network device poll its Web agent and send a packet back to the HTTP process module in the manner claimed. As explained in col. 5, lines 40-43 of Stupek: "*The management server 102 provides a management foundation, which includes discovery of manageable devices, performance of event management and determination of device status and device groups.*" This may be compared with the objective of the present invention, fully supported by positive recitations in the claims and set forth in lines 1-6 on page 1, that "*by utilizing this method, the invention can directly manage network devices through Web browser without additionally installing a management module in the workstation*" (as in Stupek).

Because neither the Stupek patent nor the Lo publication, whether considered individually or in any reasonable combination, discloses or suggests the claimed network device poll of a Web agent embedded therein, and report to an HTTP module connected to multiple network devices, and because the failure of Stupek and Lo to teach positively claimed features of the invention relates to entirely different objectives, it is respectfully submitted that the proposed combination of Stupek and Lo would not have suggested the claimed invention to the person of ordinary skill in the art, and therefore withdrawal of the rejection of claims 1-10 under 35 USC §103(a) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,

BACON & THOMAS, PLLC

Date: January 25, 2006   By: BENJAMIN E. URCIA
                                   Registration No. 33,805

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BACON & THOMAS, PLLC
625 Slaters Lane, 4th Floor
Alexandria, Virginia 22314

Telephone: (703) 683-0500

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